



December 5, 2024

The Honorable James Comer
Chairman
House Committee on Oversight and
Accountability
2157 Rayburn House Office Building
Washington, DC 20515

The Honorable Jamie Raskin
Ranking Member
House Committee on Oversight and
Accountability
2106 Rayburn House Office Building
Washington, DC 20515

Re: *Protecting the Count and the 2030 Census*

Dear Chairman Comer and Ranking Member Raskin:

The National Urban League and the National Coalition on Black Civic Participation (NCBCP), as co-conveners of the Census Black Roundtable and Unity Diaspora Coalition, write to contribute comments for the public record as part of the House Committee on Oversight and Accountability's hearing today entitled "Oversight of the U.S. Census Bureau." Established in 2018, the Census Black Roundtable, which was created to mobilize the Black community and ensure an accurate count, is comprised of Census advocates, clergy, children's organizations, redistricting experts, and civil rights organizations, including the National Urban League's 92 Affiliates that operate in over 300 communities across the country. In 2010, NCBCP established the Unity Diaspora Coalition, in partnership with the National Urban League, to maximize the Black population participation in the Decennial Census.

Today's hearing comes at an important, mid-decade inflection point in our nation's history. We hope that this hearing will illuminate the need for accurate Census data as we seek to preserve and uphold the principles of our democracy that support fairness, the right to vote, and political representation. We further desire today's discourse to make clear that *all* Americans need and benefit from an accurate Census count. America wins when we are all counted and represented. Because so much is on the line, we encourage a comprehensive discussion today on the need for increased transparency, public trust and an intolerance for partisan attempts to disrupt a fair Census for the purpose of political gain. We call your attention to the following issues of importance to members of our community:

1. An Accurate Count of the Black Population is an Accurate Count of America

Each decade, Black Americans are significantly undercounted in the Decennial Census, leading to devastating losses in both federal funding allocations and political representation nationwide. The U.S. Census Bureau released data revealing that the Black population had a statistically significant undercount of 3.3% in the 2020 Census. Moreover, children ages 0 to 4, including Black and Latino children, were undercounted in the 2020 Census in every U.S. state—notably, higher in the 2020 Census than in years prior.¹ New methods and operations are needed to ensure an improved and accurate count of the Black population in the 2030 Census.

2. Full Funding of the 2030 Census Facilitates an Accurate Count

Until the next Decennial Census in 2030, the federal government will continue to rely on 2020 Census and American Community Survey data to determine the distribution of approximately \$1.5 trillion across 316 federal programs, including Medicare and Medicaid, Head Start, student loans, and highway construction grants. While funding formulas are complex, the George Washington Institute of Public Policy places the value of each completed Census form at more than \$4,000 per person.² Under this estimate, an undercount of 2 million people could represent a loss of more than \$8 billion in federal funding to those individuals and their communities. As modernization efforts materialize and costs begin to escalate, cutting the Census budget will cripple Census research, planning and design efforts, stifling efforts to improve Census operations and data accuracy.

In FY 2025, the U.S. Census Bureau is expected to finalize plans and preparations for the 2026 Census Test—the first of two major field tests that will inform design decisions for the 2030 Census. In the last Decennial Census, inadequate funding mid-decade adversely affected the accuracy of the 2020 Census causing, amongst other things, the cancellation of two of the three final dress rehearsal test sites in 2018. Robust and sustained funding of the U.S. Census Bureau is essential to improving performance and inspiring greater efficiencies, both at the Census Bureau and throughout the federal statistical system. Politically motivated tampering with the U.S. Census Bureau's budget to achieve partisan advantage is an act of sabotage of the count and must be rejected.

3. The Census is Not a Political Tool

Following the 2020 Census count, the National Urban League publicly called for congressional hearings to address the extreme politicization of the U.S. Census

¹ U.S. Census Bureau, "Census Bureau Releases Estimates of Undercount and Overcount in the 2020 Census," (March 2022), <https://www.census.gov/newsroom/press-releases/2022/2020-census-estimates-of-undercount-and-overcount.html>

²The George Washington Institute of Public Policy, "Counting for Dollars 2020: The Role of the Decennial Census in the Geographic Distribution of Federal Funds," (April 2020), <https://gwipp.gwu.edu/counting-dollars-2020-role-decennial-census-geographic-distribution-federal-funds>

Bureau and the 2020 Census.³ Partisan and political interference in the 2020 Census disrupted the statutory headcount, bending the needle away from accurate data, representation, federal funding, and the U.S. Census Bureau's constitutional mandate to count every person residing in the United States. This cannot happen for the next Decennial Census.

The U.S. Census Bureau's residency criteria policy of counting people in prison as residents of the prison location emboldens prison gerrymandering by distorting population data, diluting political power of other residents, and pulling resources away from pre-incarceration addresses. Additionally, any altering of research plans or operations to hinder the count of historically undercounted or hard to reach respondents, such as limiting the number of contacts a given household receives to secure an interview, will have severe consequences for the Census count, federal funding, representation and data accuracy.

4. Transparency is Needed to Build Public Trust

Marred by the COVID-19 global pandemic, the 2020 Census communications campaign was unable to fully execute and increase Census participation as planned and failed efforts to impose a citizenship question on the Census questionnaire challenged the public's interest and trust in the Census process. Misinformation and disinformation about the Census similarly triggered public distrust.

The Decennial Census is the nation's largest peacetime civic event, and the public's trust must be regained in order for a successful 2030 Census. Census plans, operations, schedules, and progress must be effectively communicated to vulnerable communities, including those most fearful of the government's actions. Unfortunately, the far-right manifesto called "Project 2025" proposes to terminate federal advisory committees, slamming the door on Census transparency and public access to information and plans. The U.S. Census Bureau cannot achieve an accurate, trustworthy, unbiased, and apolitical Census if even a *single* Project 2025 objective is put into place. Flooding the U.S. Census Bureau with unqualified political operatives with the authority to exert full control over the federal statistical infrastructure allows for a fully partisan U.S. Census Bureau and other statistical agencies (i.e., Bureau of Labor Statistics and the Bureau of Economic Analysis). The incoming administration must build public trust through increased transparency and opportunities for public feedback and input in 2030 Census plans and operations.

Conclusion

³ National Urban League, "Historic Census Undercount of Black Americans Robs Communities of Billions in Funding and Fair Political Representation," (2021), <https://nul.org/news/historic-census-undercount-of-black-americans-robs-communities>

The National Urban League and the National Coalition on Black Civic Participation have a longstanding history of advocating for equality, representation and economic progress for African Americans and vulnerable populations. For decades we have worked on a nonpartisan basis to ensure an accurate Census. Americans deserve fairness, transparency, trust—and an accurate count. We invite members of your Committee to join us in our continued efforts to secure representation and transparency for each person residing in the United States in the Decennial Census.

Sincerely,

Marc H. Morial
President and CEO
National Urban League

Melanie Campbell
President and CEO
National Coalition on Black Civic Participation
Black Women's Roundtable